

AUSTIN LEGAL VIDEO, LLC,	§	
DEPO-NOTES, LLC, and PASQUAL	§	
PEREZ, III,	§	
<i>Plaintiffs,</i>	§	C.A. No. 1:23-cv-00421-DAE
v.	§	
	§	
DEPOSITION SOLUTIONS, LLC D/B/A	§	
LEXITAS, COURT REPORTERS	§	
CLEARINGHOUSE, INC., ALDERSON	§	
REPORTING COMPANY, INC.,	§	
SOUTHWEST REPORTING & VIDEO	§	
SERVICE, INC., KENNEDY REPORTING	§	
SERVICE, INC., TEXAS COURT	§	
REPORTERS ASSOCIATION, INC.,	§	
SPEECH TO TEXT INSTITUTE, INC.,	§	
SHERRI FISHER, LORRIE SCHNOOR,	§	
SONIA TREVINO, AND SHELLY TUCKER,	§	
<i>Defendants.</i>	§	

Defendants Sherri Fisher, Lorrie Schnoor, Sonia Trevino, Shelly Tucker, and Kennedy Reporting Service, Inc. (collectively “Defendants”) hereby submit their expert disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2):

Mr. Madden or Mr. Holmgren will testify as to reasonable and necessary attorney's fees incurred by the parties in connection with this dispute. The testimony, if any, will be based upon respective knowledge, experience, training in the legal profession as well as the mental impressions they may obtained as a result of reviewing the bills (redacted) produced in this case.

1

Appeals, handling a Petition for Review to the Supreme Court and oral argument before the Supreme Court.

Generally, the testimony will be based upon review of redacted bills in this matter; the time and labor required; the novelty and difficulty of the question at issue in this case; the skill required to perform the legal service properly; the preclusion of other employment by the attorney and the firm due to the acceptance of the case; the customary fee; time limitations imposed by the circumstances; the amount of time involved; the ability of the attorney; awards in similar cases; and their knowledge and experience as to fees charged for these types of services and cases in and around Dallas County, Texas.

Counsel is not “retained or specially employed to provide expert testimony in the case or one whose duties as the party's employee regularly involve giving expert testimony.” As such, no report is necessary pursuant to Fed. R. Civ. P. 26(a)(2)(B). However, Counsel will produce the underlying billing statements in redacted from to protect privilege.

Respectfully submitted,

/s/ Dennis Holmgren

Dennis Holmgren

State Bar No. 24036799

HOLMGREN JOHNSON: MITCHELL MADDEN LLP

North Central Plaza III

12801 North Central Expressway

Suite 140

Dallas, Texas 75243

Telephone: 972.484.7780

Facsimile: 972.484.7743

Dennis@hjmmllegal.com

ATTORNEY FOR DEFENDANTS SHERRI
FISHER, LORRIE SCHNOOR, SONIA
TREVINO, SHELLY TUCKER, AND
KENNEDY REPORTING SERVICE, INC.

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2025, this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. The following is being served by first class mail:

Greg Kohn
Executive Manager
Speech to Text Institute, Inc.
16 Patterson Avenue
Titusville, NJ 08560

/s/ Dennis Holmgren
Dennis Holmgren